

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

LUCKY BUCKS HOLDINGS LLC,

*Debtor.*

MARC ABRAMS,

In his capacity as Chapter 7 Trustee of Lucky  
Bucks Holdings LLC and as assignee,

*Plaintiff,*

v.

TRIVE CAPITAL MANAGEMENT LLC,  
*et al.,*

*Defendants.*

Chapter 7

No. 23-10756 (KBO)

Adversary Proceeding

No. 24-ap-50130 (KBO)

**DECLARATION OF ROSS E. FIRSENBAUM IN SUPPORT OF TRIVE DEFENDANTS’  
MOTION TO COMPEL**

I, Ross E. Firsenbaum, an attorney duly admitted to practice law in the State of New York and the Commonwealth of Massachusetts, declare under penalty of perjury as follows:

1. I am a partner at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, which is counsel for Trive Capital Management, LLC, Trive Capital Fund III LP, Trive Capital Fund III-A LP, TCFIII Luck LP, TCFIII Luck SPV LP, TCFIII Luck Acquisition LLC, Southern Star Gaming, LLC, and Shravan Thadani (collectively, the “Trive Defendants”) in the above-captioned matter. I make this declaration in support of the *Trive Defendants’ Motion to Compel*, filed herewith on August 12, 2025.

2. Attached as **Exhibit A** is a true and accurate copy of an email chain between Wilmer Cutler Pickering Hale and Dorr LLP, and Quinn Emanuel Urquhart and Sullivan, LLP, counsel to Plaintiff, dated between October 11, 2024 and November 14, 2024.

3. Attached as **Exhibit B** is a true and accurate copy of a letter from Plaintiff's counsel to the Trive Defendants' counsel, dated March 5, 2025, with a true and accurate copy of the Trive Defendants' First Set of Document Requests to the Plaintiff, dated March 5, 2025 attached as an exhibit to the letter.

4. Attached as **Exhibit C** is a true and accurate copy of Plaintiff's Responses and Objections to Trive Defendants' First Set of Requests for Production of Documents, dated April 4, 2025.

5. Attached as **Exhibit D** is a true and accurate copy of a letter from the Trive Defendants' counsel to Plaintiff's counsel, dated April 23, 2025.

6. Attached as **Exhibit E** is a true and accurate copy of a letter from the Trive Defendants' counsel to Plaintiff's counsel, dated May 2, 2025.

7. Attached as **Exhibit F** is a true and accurate copy of a letter from Plaintiff's counsel to the Trive Defendants' counsel, dated May 12, 2025.

8. Attached as **Exhibit G** is a true and accurate copy of a letter from the Trive Defendants' counsel to Plaintiff's counsel, dated June 3, 2025.

9. Attached as **Exhibit H** is a true and accurate copy of a letter from Plaintiff's counsel to the Trive Defendants' counsel, dated June 23, 2025.

10. Attached as **Exhibit I** is a true and accurate copy of a letter from the Trive Defendants' counsel to Plaintiff's counsel, dated July 17, 2025.

11. Attached as **Exhibit J** is a true and accurate copy of a letter from the Trive Defendants' counsel to Plaintiff's counsel, dated July 25, 2025.

12. Attached as **Exhibit K** is a true and accurate copy of a letter from Plaintiff's counsel to the Trive Defendants' counsel, dated July 31, 2025.

13. Attached as **Exhibit L** is a true and accurate copy of a letter from the Trive Defendants' counsel to Plaintiff's counsel, dated August 8, 2025.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 12, 2025  
New York, New York

/s/ Ross E. Firsenbaum  
Ross E. Firsenbaum